

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE TEACHERS' RETIREMENT SYSTEM OF THE CITY OF NEW YORK, THE NEW YORK CITY EMPLOYEES' RETIREMENT SYSTEM, THE NEW YORK CITY POLICE PENSION FUND, THE NEW YORK CITY FIRE DEPARTMENT PENSION FUND, THE BOARD OF EDUCATION RETIREMENT SYSTEM OF THE CITY OF NEW YORK, THE NEW YORK CITY DEFERRED COMPENSATION PLAN, and THE TEACHERS' RETIREMENT SYSTEM OF THE CITY OF NEW YORK VARIABLE ANNUITY PROGRAM, individually and on behalf of all others similarly situated,

Plaintiff,

-against-

COUPANG, INC., BOM SUK KIM, GAURAV ANAND, MICHAEL PARKER, MATTHEW CHRISTENSEN, LYDIA JETT, NEIL MEHTA, BENJAMIN SUN, KEVIN WARSH, HARRY YOU, GOLDMAN SACHS & CO. LLC, ALLEN & COMPANY LLC, J.P. MORGAN SECURITIES LLC, CITIGROUP GLOBAL MARKETS INC., HSBC SECURITIES (USA), INC., DEUTSCHE BANK SECURITIES INC., UBS SECURITIES LLC, MIZUHO SECURITIES USA LLC, and CLSA LIMITED

Defendants.

**CIVIL ACTION**

No. 1:22-cv-07309

Honorable Vernon S. Broderick

**STIPULATION AND [PROPOSED] ORDER**

Lead Plaintiffs Teachers' Retirement System of the City of New York, the New York City Employees Retirement System, the New York City Police Pension Fund, the New York City Fire Department Pension Fund, the Board of Education Retirement System of the City of New York,

the New York City Deferred Compensation Plan, and the Teachers' Retirement System of the City of New York Variable Annuity Program (collectively, "Lead Plaintiffs"), individually and on behalf of all others similarly situated, and Defendants Citigroup Global Markets Inc., HSBC Securities (USA), Inc., Deutsche Bank Securities Inc., UBS Securities LLC, and Mizuho Securities USA LLC, by and through their undersigned counsel, submit this Stipulation and state as follows:

WHEREAS, on August 26, 2022, this action was commenced by the filing of a complaint (ECF No. 1) against Coupang, Inc., Bom Suk Kim, Gaurav Anand, Michael Parker, Matthew Christensen, Lydia Jett, Neil Mehta, Benjamin Sun, Kevin Warsh, Harry You, Goldman Sachs & Co. LLC, Allen & Company LLC, and J.P. Morgan Securities LLC (the "Initial Defendants");

WHEREAS, on September 16, 2022, the Court *inter alia* ordered that Lead Plaintiffs shall have 60 days after appointment to file an amended complaint or, alternatively, to designate the initial complaint as the operative complaint, and set a schedule for responding to the operative complaint (ECF No. 16) (the "Initial Scheduling Order");

WHEREAS, on May 24, 2023, Lead Plaintiffs filed their first amended class action complaint (ECF No. 50) (the "Amended Complaint"), in which they named Citigroup Global Markets Inc., HSBC Securities (USA), Inc., Deutsche Bank Securities Inc., UBS Securities LLC, and Mizuho Securities USA LLC (collectively, the "Newly-Added Defendants") as Defendants for the first time;

WHEREAS, on July 17, 2023, the Court *inter alia* ordered that any motion to dismiss shall be filed by no later than July 28, 2023, and any opposition thereto shall be filed by no later than October 3, 2023 (ECF No. 64) (the "Revised Scheduling Order");

WHEREAS, counsel for the Newly-Added Defendants have agreed to accept service of the summons and Amended Complaint on behalf of the Newly-Added Defendants; and

WHEREAS, Lead Plaintiffs and the Newly-Added Defendants agree that the current schedule for a response to the Amended Complaint set forth in the Scheduling Order, as modified by the Revised Scheduling Order, should apply to the Newly-Added Defendants.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Lead Plaintiffs and the undersigned counsel for the Newly-Added Defendants that:

1. The undersigned counsel for the Newly-Added Defendants hereby accept service of the summons and Amended Complaint on behalf of the Newly-Added Defendants and certify that they are authorized to do so.

2. By entering into this Stipulation, the Newly-Added Defendants do not waive any defense(s) other than defenses based on insufficient process and insufficient service of process.

3. The schedule provided in the Scheduling Order (ECF No. 16) with respect to a response to the Amended Complaint, as modified by the Revised Scheduling Order (ECF No. 64), shall apply to the Newly-Added Defendants.

DATED: July 27, 2023

/s/ Emma Gilmore

Jeremy A. Lieberman

Emma Gilmore

Justin D. D'Aloia

Dolgora Dorzhieva

**POMERANTZ LLP**

600 Third Avenue

New York, NY 10016

Tel: (212) 661-1100

jalieberman@pomlaw.com

egilmore@pomlaw.com

jdaloia@pomlaw.com

ddorzhieva@pomlaw.com

*Counsel for Lead Plaintiffs and Lead Counsel  
for the Classes*

/s/ Daniel C. Lewis

Daniel C. Lewis

Elizabeth J. Stewart

**SHEARMAN & STERLING LLP**

599 Lexington Avenue

New York, New York 10022

Tel: 212.848.4000

daniel.lewis@shearman.com

eliabeth.stewart@shearman.com

*Counsel for Goldman Sachs & Co. LLC, Allen  
& Company LLC, J.P. Morgan  
Securities LLC, Citigroup Global Markets  
Inc., HSBC Securities (USA), Inc., Deutsche  
Bank Securities Inc., UBS Securities LLC, and  
Mizuho Securities USA LLC*

IT IS SO ORDERED THIS 15 OF September, 2023

A handwritten signature in black ink, reading "Vernon Broderick". The signature is written in a cursive style with a large initial "V".

Honorable Vernon S. Broderick  
District Court Judge